

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, <i>Co-Chair</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
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VIA ECF AND FACSIMILE

January 21, 2016

The Honorable Frank Maas
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan United States
Courthouse
500 Pearl Street, Room 740
New York, NY 10007-1312

MEMO ENDORSED

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Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (FM)

Dear Judge Maas:

The Plaintiffs' Executive Committees write to respectfully request that the existing deadline for submission of plaintiffs' motion to compel as to defendant Dallah Avco be extended two weeks from January 22, 2016 to February 5, 2016. Counsel for the plaintiffs and the defendant recently conducted a meet-and-confer on January 15, 2016 to address various issues with respect to Dallah Avco's document production. As a result of those discussions, plaintiffs are seeking the additional time to consult with their translators and conduct a further review of the defendant's mostly Arabic documents in an effort to narrow the scope of issues to be raised in plaintiffs' motion. Plaintiffs have conferred with counsel for Dallah Avco and they consent to the extension.

Plaintiffs thank Your Honor in advance for the Court's attention to this matter.

Respectfully submitted,

**APPLICATION GRANTED
SO ORDERED**

Frank Maas
Frank Maas, USMJ

2/11/16

J. Scott Tarbutton
J. Scott Tarbutton, Esq.

THE MDL 1570 PLAINTIFFS' EXECUTIVE
COMMITTEES